



February 22, 2010

DCR Forest Futures Visioning Process Comments  
c/o MODR  
University of Massachusetts, Boston  
100 Morrissey Boulevard, M-1-627  
Boston, MA 02125

Dear Madam or Sir:

DCR is pleased to offer the following comments on the Technical Steering Committee's draft recommendations. Before introducing those comments however, the agency wishes to extend its heartfelt appreciation to the Technical Steering Committee (TSC) for the considerable time and effort its members committed to produce a thoughtful set of recommendations. We are grateful to each of the members of the TSC for their contribution to this important initiative. Also important to the process has been the Advisory Group of Stakeholders. These dedicated volunteers have shared their time and knowledge throughout this process and their perspective and contribution is evident in the document that has emerged from the TSC. DCR and the Commonwealth are fortunate to have such dedicated volunteers and advisors.

DCR's comments below are informed by diverse and passionate submittals received from numerous professional staff throughout the agency. All of these comments cannot be included here but we have attempted to capture key points as briefly as possible. DCR believes many of these recommendations warrant careful consideration as the agency sets its future direction for the stewardship of DCR forests and we know that these same professional staff will play valuable roles in their implementation.

### **Recommendation 1 - Adoption of an Ecosystem Services Model to Guide Forest Protection and Management**

DCR fully supports the philosophy of managing its State and Urban forest lands under an ecosystem services model that recognizes a broad suite of management values - biodiversity protection, clean water, carbon sequestration, soil formation and nutrient cycling and public recreation. In fact, much of the ecosystem services model is grounded in the familiar principles that have guided DCR and its predecessor agencies for over a century. The new model offers the opportunity and the challenge of blending the familiar

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and the new, establishing clear and consistent ecosystem priorities for different landscape zones and demonstrating this updated approach to DCR forest management.

### **Recommendation 2 - Elevated Role for Massachusetts Forests in Commonwealth Environmental Decision-Making Processes**

Among the many insights gained from the Forest Futures Visioning process, few have been as profoundly clear as the importance of integrating forest management among the multiple ecosystem services and values associated with DCR lands. DCR believes that a new elevated position overseeing forest stewardship and managing for ecosystem services within the parks system is the appropriate approach to accomplish that. From this position, the new Director of Forest Stewardship would interact with the other professional and management staff within DCR and the Executive Office of Energy and Environmental Affairs and ensure that forest ecosystem stewardship was an integral consideration in a wide range of land management decisions.

### **Recommendation 3 – Policies for Privately owned Forests in the Commonwealth**

DCR appreciates the TSC's recommendations related to promoting improved forest stewardship on private lands. For more details, please see the comments submitted by DCR's Service Forestry program regarding this recommendation.

### **Recommendation 4 – New DCR Landscape Planning Model**

The recommended Landscape Planning Model offers an exciting platform to reconsider management priorities for agency lands. The new approach builds upon decades of resource management zoning developed within DCR and its predecessor organizations. The concept also introduces some challenges including:

- Developing consistent, effective and objective models for guiding the designation of landscape zones.
- Facilitating an inclusive public process to introduce the landscape zoning designations and solicit public input.
- Reconciling landscape level zoning designations with finer scale resource management or protection prescriptions that exist today and will emerge in the future as a result of detailed resource management plans or other processes.
- Determining appropriate recreational uses associated with each landscape zone with necessary stakeholder guidance and public review.
- Establishing clear guidelines for the management of exotic and invasive forest pests within landscape zones (including sometimes in reserves).

DCR is enthusiastic about the landscape zoning principles and expects to initiate the implementation process soon after the receipt of the TSC recommendations.

## **Recommendation 5 – Management Approaches for Forest Reserves**

DCR is a strong advocate for forest reserves and supports expansion of them. The TSC report articulates well the scientific complexities of reserve management and some DCR professional staff have also highlighted the various existing and potential future “on the ground” management challenges that merit careful consideration. These healthy discussions will likely continue throughout the reserve designation process and ultimately will produce the strongest reserve system possible.

Significant expansion of reserves may introduce social complexities as stakeholder communities, user groups and taxpayers assess the value of this commitment and investment relative to other alternatives. Critical to achieving our collective goal of expanding forest reserves will be a clear and compelling scientific rationale (framed perhaps by the TSC report and the committee of forest ecologists and biodiversity experts suggested in the recommendations) and an open dialogue with all stakeholders, including local communities surrounding potential reserves. DCR looks forward to this process.

## **Recommendation 6 – Management Approaches For Parklands**

DCR suggests the addition of language referencing habitat protection to the general recommendation statement for parklands such as, “*DCR should develop and implement management guidelines for Parklands that focus on enhancing recreation, **while protecting important habitat** and cultural values of the property.*” We feel that it is important to understand that in the parkland zone, while tree cutting would be limited to what is necessary to support recreational assets and ensure public safety, DCR’s responsibility would still include vegetation management related to stewardship of priority habitat (under the guidelines of an approved NHESP Habitat Management Plan). The Blue Hills Reservation in metropolitan Boston is one example of the importance of rare species habitat stewardship in DCR facilities that might be zoned as Parkland. Seventy percent of the Reservation is identified by the NHESP as priority habitat. In terms of priority habitat, the agency’s mission and charge is the same on all of its lands, whether they be zoned as Parklands, Woodlands or Forest Reserves.

Furthermore, it should be noted that ecological restoration of priority habitat or exemplary communities should only be conducted under the guidelines of a NHESP-approved Habitat Management Plan. This established process would take precedence over the TSC’s recommendation to evaluate options with local citizen stewards in determining a course of action. That being said, in following the NHESP protocol, DCR would seek to engage and share information with the interested public.

## **Recommendation 7 – Management Approaches for Woodlands**

The TSC recommends that the woodlands emphasize educating landowners and the public about sustainable forestry. DCR believes that watershed management, early and late successional forestry and production of timber for local markets are important aspects of demonstrating model forestry practices. The TSC recommendations could elaborate more

on the ways in which woodlands can enhance these values. For example, management of woodlands can restore late successional habitat to complement and add to habitat slowly created in forest reserves. It can help stem the decline of early successional species and guide private landowners in scientifically-guided management for these more than 20 species. It can guide municipal water supply managers in fostering resilient forests around their reservoirs. It can foster local products by requiring all products from state lands be processed locally – helping support 1,000 rural jobs or 4% of all rural jobs. It can improve harvesting standards on private lands by requiring Master Logger Certifications lands and low-impact equipment on state lands. To that end, we suggest the following goal be added to Recommendation 7 to clarify the multiple values offered by woodlands: “To improve forest management on the 90% of Massachusetts forests not managed by DCR by increasing forestry standards on private lands, especially on forests that flow to public water supplies; increasing forestry that enhances or restores early and late successional habitats; increasing the number of harvesters with “Master Logger” or equivalent status; increasing the use of low-impact harvesting equipment; and enhancing local forest processing markets and rural economies.”

DCR noted at the public forums that a number of questions and comments surfaced about the TSC’s guidelines for management and “on the ground” implementation in the woodlands. DCR professional staff has also raised some issues related to this recommendation. Most are reflected in the cautionary note Dr. Mark Ashton emphasized in his presentation to the TSC about not “taking a tool out of the toolbox” and maintaining flexibility to address circumstances in the future that no one can envision or plan for today. We appreciate the challenge of the TSC’s charge, seeking to give adequate direction and guidance while also acknowledging the agency’s role at the implementation level as the manager of 308,000 acres of land with varying uses and characteristics. At the same time, the agency convened the Forest Futures process in part to seek guidance on its forest management practices. We briefly elaborate on these themes in the comments below.

DCR understands the TSC’s rationale in recommending an overall shift toward uneven age management. We strongly believe that uneven age silviculture is desirable where site conditions and species are appropriate. We will evaluate this recommendation in light of the current conditions of the forests across the parks system (note that DCR inventory shows that only 15% of DCR forests are classified as “late successional” and only 4% as uneven aged).

DCR appreciates the TSC’s emphasis on biodiversity preservation as an ecosystem service provided by DCR forests. We also support the recommendation to create early successional habitat in a science-based manner where appropriate. The recommended stand classification will help to guide management for this important value.

Overall, forest managers of the future should be allowed appropriate flexibility. To that end, allowing a wider range of silvicultural options for managing primary and secondary forests would make it easier for foresters to work with the existing stand conditions. At the same time, DCR understands the public’s concern about the size of openings and the agency’s responsibility to carefully oversee work on the ground to ensure the highest standards are met. All of DCR’s forest management work should be a “model” of how to

do it right, sensibly and sustainably. We will carefully consider these issues in evaluating this recommendation and setting policy going forward.

Finally, DCR acknowledges the TSC's concern that the expansion of large scale biomass energy facilities pose a potential risk to the ecosystem services offered by DCR forests. The agency believes that a focus on maintaining proper nutrient levels in forest soils is the best way to ensure resource protection. We also emphasize our responsibility to ensure that harvesting standards are adhered to, whatever specific type of equipment is used.

### **Recommendation 8 – DCR Organizational Structure, Decision-making and Planning**

The TSC and especially its Chair, Lisa Vernegaard, invested substantial time assessing the planning process and resources within the agency. Their recommendations for improving the organizational structure to better integrate the collective skills and talents among DCR staff and increase the organization's overall effectiveness warrants attention and action.

### **Recommendation 9 – Improving Public Process**

DCR appreciates and embraces the strong recommendations for improving the public dialogue regarding forest management and the many other management decisions confronting the multi-faceted agency. The Patrick Administration has specifically challenged agencies to expand public engagement and DCR has made many genuine efforts in that regard. From capital investment projects to recreational use policies to community partnerships, the agency has specifically sought out means to engage stakeholders in decision-making. The Forest Visioning process itself is a dramatic example of the agency's investment in public engagement. Importantly, even that extensive process has been criticized for its effectiveness, its time requirements and its expense. Good communication requires the investment of a variety of resources - most significantly staff time and funding, and in an era when government budgets require limitations on both, we expect that both the agency and our stakeholder constituencies will continue to identify opportunities for improvement. We appreciate the TSC recommendations and look forward to continued progress in this key area.

### **Recommendation 10 – Resources Needed to Implement the TSC Recommendations**

This TSC correctly recognizes the financial and staff resource investments necessary to accomplish the many specific tasks outlined in the report. Whereas DCR has recently lost about 180 staff and is working with a budget that has shrunk by more than 20 percent since the start of the Forest Visioning process, the challenge will be significant. At the same time, as daunting management challenges such as invasive species become more pervasive, significant additional resources are required. This recommendation also includes some specific suggestions for staff reallocation and additional funding sources. The agency will consider each of these and others as it pursues these recommendations and the many other requirements of its diverse mission.

Thank you for the opportunity to provide comments on the draft Forest Futures recommendations. We look forward to reviewing the final recommendations of the Technical Steering Committee soon.

Sincerely,

A handwritten signature in black ink, appearing to read 'RKS', with a stylized flourish at the end.

Richard K. Sullivan, Jr.  
Commissioner